

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Draft Title V No. V-98-000

TG KENTUCKY

LEBANON, KENTUCKY

June 6, 2000

NANCY WATKINS REVIEWER

SOURCE DESCRIPTION:

Manufacture of plastic and rubber parts for the automotive industry.

Major Title V Source for VOC and HAPs.

Synthetic Minor Source with respect to Regulation 401 KAR 51:017.

COMMENTS:

Particulate control: baghouse for rubber raw material weighing, kneading, and milling with 99.9% efficiency to be checked by opacity tests. Water walls for paint booths with 95% efficiency to be checked by opacity tests. Method 5 test of one of the four water walls to establish monitoring parameters. Particulate emission factors from consultant. Regulation 401 KAR 59:010 applies.

No VOC control.

VOC emission factors from rubber compounding from the Rubber Manufacturer's Association database for the rubber processes of kneading, milling, extrusion, and platen press curing. USEPA's Emission Factors and Inventory Group (EFIG) labeled this database as *draft* in AP-42, Chapter 4, Section 12. This was received in November, 1997, for consideration for inclusion in AP-42 under EFIG's Public Participation Plan (PPP).

VOC emission factors for plastics extrusion from worst case VOC content on MSDS where available. Where not available, conservative engineering judgement. VOC emission factors from paint and solvents assumed to be 1.0. VOC from weighing, engineering judgement. HAPs and Kentucky Air Toxics emission factors from highest MSDS concentrations and maximum processing rates.

Regulation 401 KAR 63:060, Hazardous air pollutants and source categories, applies, but has no applicable requirement. No process specific regulation at this time. Permit would need to be reopened if Plastics Parts and Products (MACT) is promulgated with three or more years left before expiration.

EMISSION AND OPERATING CAPS DESCRIPTION:

VOC emissions cap of 225 tons/yr.